



**Cal/EPA**

**Los Angeles  
Regional Water  
Quality Control  
Board**

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March 27, 1998

Mr. Michael Young  
Integrated Environmental Services, Inc.  
3990 Westerly Place, Suite 210  
Newport Beach, CA 92660

**STOCKPILE AND POST-REMEDIAL EXCAVATION CONFIRMATION REPORT - PARCEL A,  
REPORT Nos. 3-10, AND SOIL BORING REPORT , PARCEL A - BOEING REALTY  
CORPORATION C-6 FACILITY LOS ANGELES, CALIFORNIA (FILE No. 100.315)**

We have received and reviewed the *Stockpile and Post-Remedial Excavation Confirmation Report - Parcel A, Report Nos. 3-10*, and the *Soil Boring Report, Parcel A*, for the *Boeing Realty Corporation C-6 Facility in Los Angeles*, dated March 1998.. The reports present the results of the Parcel A soil stockpile characterizations, and the confirmational sampling results for the Parcel A remedial excavations. Our comments are as follows:

- We concur that the use of stockpiles that did not exceed the soil screening criteria as backfill is appropriate. Stockpiles that exceeded the screening criteria were removed by a licensed hazardous waste hauler and properly disposed of as non-RCRA hazardous waste. However, portions of 1) B37-RE-4 Stockpile AQ, 2) OA1-RE-2 Stockpile E, 3) WL-RE-1 Stockpiles A and B, 4) B44-RE-1 Stockpile C, 5) B37CL-RE-1 Fill soil Section C and Stockpile A, 6) OA2-RE-3 (PH LTU-1B), and 7) B41-LTU-2 (B41-GS-6-1') are unsuitable for use as backfill, but currently remain on site. Provide us with a schedule for, or a copy of all applicable manifests and permits related to, the disposal of the soil stockpiles referenced above.
- We concur that confirmational sampling indicates that the remedial excavations (0 -12 feet bgs), in general, do not exceed site screening criteria, and are deemed suitable for backfill. However, soil in the vicinity of sample B36-6S-25-3' in Remedial Excavation B36-RE-1 exceeds the screening criteria for the site and additional removal is proposed. Provide us with an excavation report and confirmation sampling data for the above removal.
- Please provide us with a copy of Appendix C.

Should you have any questions or comments regarding the above, please call me at (213)266-7550.

J.E. ROSS, P.E., Unit Chief  
Site Cleanup Unit

cc: Ms. Karen Baker, DTSC, Long Beach  
Ms. Debbie Oudiz, Office of Scientific Affairs  
Mr. Mario Stavale, Boeing Realty Corporation  
Mr. Jeff Dhont, Federal EPA

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INTEGRATED  
Environmental Services, Inc.

April 10, 1998

Via Facsimile and Federal Express

James E. Ross, P.E.  
Unit Chief, Site Cleanup Unit  
Regional Water Quality Control Board  
Los Angeles Region  
101 Center Plaza Drive  
Monterey Park, CA 91754-2156

**Subject:** Response to RWQCB Memo re. *Stockpile and Post-Remedial Excavation Confirmation Report - Parcel A, Report Nos. 3-10, and Soil Boring Report, Parcel A, March 27, 1998*

**Project:** Boeing C-6 Facility, Parcel A, Los Angeles (RWQCB File No. 100.315)

Dear Mr. Ross:

Integrated has reviewed the Water Board's comments on the referenced reports and has prepared the following to further address the comments. Each Board comment is presented below in italics, followed by Integrated's response.

*Comment 1: We concur that the use of stockpiles that did not exceed the soil screening criteria as backfill is appropriate. Stockpiles that exceeded the screening criteria were removed by a licensed hazardous waste hauler and properly disposed of as non-RCRA hazardous waste. However, portions of 1) B37-RE-4 Stockpile AQ, 2) OA1-RE-2 Stockpile E, 3) WL-RE-1 Stockpiles A and B, 4) B44-RE-1 Stockpile C, 5) B37CL-RE-1 Fill soil Section C and Stockpile A, 6) OA2-RE-3 (PH LTU-1B), and 7) B41-LTU-2 (B41-GS-6-1') are unsuitable for use as backfill, but currently remain on site. Provide us with a schedule for, or a copy of all applicable manifests and permits related to, the disposal of the soil stockpiles referenced above.*

Response: Integrated agrees that the aforementioned stockpiles are not appropriate for use as backfill. These stockpiles will be removed and properly disposed off site. Copies of permits, shipping manifests, and receipts will be provided to the RWQCB once off-site disposal has been completed.

*Comment 2: We concur that confirmational sampling indicates that the remedial excavations (0 - 12 feet bgs), in general, do not exceed site screening criteria, and are deemed suitable for backfill. However, soil in the vicinity of sample B36-GS-25-3' in Remedial Excavation B36-RE-1 exceeds the screening criteria for the site and additional removal is proposed. Provide us with an excavation report and confirmation sampling data for the above removal.*

Response: Integrated concurs that the soil in the vicinity of sample B36-GS-25-3' in Remedial Excavation B36-RE-1 exceeds the screening criteria for the site. This soil has been excavated to 12 feet bgs to address DTSC's requested arsenic removal. Data for the above removal will be provided in an addendum to the Post-Demolition Risk Assessment.



*Comment 3: Please provide us with a copy of appendix C.*

Response: We apologize for not having the appendix ready when the report was submitted. Appendix C has since been completed and distributed.

I appreciate the opportunity to work closely with you and your staff on this important project. Should you or your staff have any further questions, please feel free to call me directly at (714) 852-9050, extension 20.

Sincerely,

Chris Stoker  
Program Manager

CC: S. Mario Stavale, Boeing



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April 17, 1998

**Mr. Michael Young**  
**Integrated Environmental Services, Inc.**  
**3990 Westerly Place, Suite 210**  
**Newport Beach, CA 92660**

**STOCKPILE AND POST-REMEDIAL EXCAVATION CONFIRMATION REPORT - PARCEL A,  
REPORT No. 11- BOEING REALTY CORPORATION C-6 FACILITY LOS ANGELES,  
CALIFORNIA (FILE No. 100.315)**

We have received and reviewed the *Stockpile and Post-Remedial Excavation Confirmation Report - Parcel A, Report No. 11, for the Boeing Realty Corporation C-6 Facility in Los Angeles*, dated March 1998. The reports present the results of the Parcel A Stockpiles N and W characterizations, and the confirmational sampling results for the B37ST-RE-1 remedial excavation. Based on the data presented in the report, we concur that the use of stockpiles N and W as backfill is appropriate. We also concur that confirmational sampling indicates that residual soils in the remedial excavation B37ST-RE-1 does not exceed site screening criteria, and is deemed suitable for backfill.

Should you have any questions or comments regarding the above, please call me at (213)266-7550.

**J.E. ROSS, P.E., Unit Chief**  
**Site Cleanup Unit**

cc: **Ms. Karen Baker, DTSC, Long Beach**  
**Ms. Debbie Oudiz, Office of Scientific Affairs**  
**Mr. Mario Stavale, Boeing Realty Corporation**  
**Mr. Jeff Dhont, Federal EPA**



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